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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: EB Docket No. 06-36
EB 06-TC-060
Certification of CPNI Filing

Dear Ms. Dortch:

In response to the Public Notice issued on January 30, 2005 by the Enforcement Bureau of the Federal Communications Commission ("Commission"), please find enclosed the 2006 Annual Customer Proprietary Network Information ("CPNI") Certification of Comcast Corporation, filed on behalf of its telecommunications carrier subsidiaries ("Comcast").

Comcast shares the Commission's concerns regarding the unauthorized disclosure of telephone call records. Although Comcast rarely uses CPNI for marketing purposes, Comcast has established procedures to ensure that its practices comply fully with applicable law and the Commission's rules, including providing notice to customers, seeking approval as needed, and implementing various other safeguards which are described in the statement accompanying the certification. Comcast is confident that the procedures it has established protect the confidentiality of its customers' CPNI.

Representatives of Comcast would welcome the opportunity to discuss the matters presented in this submission should the Commission have any questions or require further information.

Sincerely,

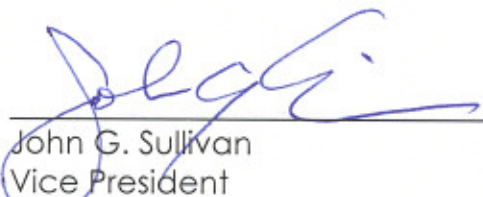
/s/ Valerie Yates
Valerie Yates, Esq.
Counsel – Telephony

Cc (via email): Byron McCoy
Best Copy and Printing



**2006 Annual Certification of
Compliance with CPNI Requirements**

I, John G. Sullivan, am an officer authorized to make this certification on behalf of the telecommunications carrier subsidiaries of Comcast Corporation. I hereby certify that I have personal knowledge that Comcast has established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission in 47 C.F.R. Section 64.2001 *et seq.* These procedures are summarized in the Statement accompanying this certification. In accordance with the FCC's rules, this Certification shall be updated annually.



John G. Sullivan
Vice President
Comcast Cable Communications, LLC



CPNI Statement of Comcast Corporation

In 47 C.F.R. § 64.2001 *et seq.*, the Federal Communications Commission ("Commission") established rules regarding customer proprietary network information ("CPNI"). Among other things, the Commission's rules require effective notice to customers of the rights they have regarding the confidentiality of CPNI. The Commission also established a variety of safeguards governing use of, disclosure of, and access to CPNI, along with reporting and record-keeping requirements. This statement summarizes the operating procedures established by Comcast Corporation ("Comcast"), on behalf of its telecommunications carrier subsidiaries, to ensure compliance with the Commission's rules.

Notice: Following the acquisition of AT&T Broadband, Comcast required that all existing customers of its telecommunications carrier subsidiaries be notified of their rights to prohibit the use of CPNI and Comcast's duty to protect its confidentiality. On an ongoing basis, new customers of Comcast's telecommunications services and its interconnected voice over Internet protocol ("VOIP") services are provided notice of these rights, for example as part of a welcome kit or welcome letter. Comcast provides customers that have not previously denied use of their CPNI annual notice of their right to do so for both communications ("opt-out") and non-communications related ("opt-in") offerings. During in-bound and out-bound telephone contacts with a customer, Comcast representatives follow applicable requirements to provide notice and obtain oral consent to use the customer's CPNI solely for the duration of the call. Comcast's privacy and CPNI policy is available on its website at the following Internet address:
http://www.comcast.com/phone_privacy/.

Consent or Denial. Consistent with the Commission's rules, Comcast established a 33-day waiting period for the customer to respond to its annual CPNI notifications. Customers may indicate their consent or refusal to permit use of, disclosure of, or access to their CPNI by calling a local or toll-free customer service number twenty-four hours a day, seven days a week. If a customer contacts Comcast to prohibit use of the customer's CPNI, the customer's account is updated to reflect the customer's preference. Comcast maintains records of approval for at least one year. Comcast maintains a record of a customer's denial of the use of CPNI indefinitely or until the customer expressly communicates a different preference. CPNI preference information is maintained electronically within the billing system.

Marketing: Comcast requires supervisory-level review of any marketing campaigns that may involve the use of CPNI. Comcast requires that all CPNI records be verified prior to conducting a direct mail or outbound calling marketing campaign that relies on the use of CPNI. Any customers that have denied use of CPNI must be removed from the solicitation. Comcast has established record-keeping requirements to ensure that complete records are maintained for a period of at least one year that include the specific CPNI that was used and the products and services offered, sold or used in the campaign.

Joint Ventures, Contractors, and Third Parties. To the extent that Comcast enters into an arrangement which entails disclosure or access to CPNI by joint venture partners or independent contractors, Comcast procedures require the joint venture partner or independent contractor to enter into a confidentiality agreement which limits access to the CPNI to the specific purposes and uses permitted by the Commission's rules in accordance with applicable opt-in or opt-out requirements, dependent on the nature of the services offered. As a matter of practice, Comcast does not sell CPNI to third parties and any disclosures are limited to the narrow circumstances permitted by the Commission's rules (such as where disclosure is permitted to protect other carriers from fraudulent, abusive, or unlawful use of, or subscription to, its services). In the event that Comcast were to provide CPNI to third parties, its existing procedures, such as obtaining express customer approval and requiring appropriate non-disclosure agreements, are sufficient to ensure that any such disclosures would comply fully with the Commission's rules.

Adherence: Comcast requires that all call center agents, including those assigned to sales and those assigned to customer service, undergo a mandatory training on the Commission's CPNI rules and Comcast's procedures with respect to the confidentiality and restrictions on use of CPNI. Training is also available on a voluntary basis for any other Comcast personnel who require further information about Comcast's policies and procedures regarding the use of CPNI. The training includes definitions, rules, scripting, applicability of CPNI rules to different categories of service, identification and modification of CPNI status within billing system records, and adherence policies. Agents trained in the use of CPNI are subject to a strict enforcement policy, including termination for repeat violations. Information regarding the rules governing CPNI is disseminated to other relevant personnel as needed through the ordinary course of business. Comcast will promptly report to the Commission if it ever discovers any material failure of these safeguards.